

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO. 23-80101(s)-CR-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

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NOTICE OF COMPLIANCE

Pursuant to the Court's Paperless Order at ECF No. 544, the Government hereby provides notice that today it provided the Court and the parties with its red-box proposed redactions to Defendant Trump's undocketed (1) Motion for Relief Relating to the Mar-a-Lago Raid and Unlawful Piercing of the Attorney-Client Privilege, the Government's Opposition to the same, and accompanying exhibits; and (2) Motion to Dismiss Based on Prosecutorial Misconduct and Due Process Violations, the Government's Opposition to the same, and accompanying exhibits. The parties are in agreement that no redactions are needed to the Reply briefs for either motion.

Yesterday, the Government filed under seal (but not *ex parte*) a chart indicating areas of dispute between the parties regarding proposed redaction of those motions. *See* ECF No. 543. There are a few additional redactions included in the red-box version submitted today that were

not indicated on the chart (e.g., redaction of witness names on pages 230 and 245¹ of the Motion to Suppress PDF and a redaction to a full sentence on paragraph 64 of Exhibit 2 to the Motion to Suppress and paragraph 64 of Exhibit 1 to the Government's Opposition to the Motion to Suppress for law-enforcement sensitive material) because the final red-box version submitted by defendant Trump yesterday inadvertently did not include these redactions that had previously been agreed to by the parties.

Respectfully submitted,

JACK SMITH
Special Counsel

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¹ Note that the pagination between the parties' red-box versions differs by one page since defendant Trump's final version added an exhibit cover page. The citation to pages here and in the chart refer to the Government's red-box version.

CERTIFICATE OF SERVICE

I, Michael E. Thakur, certify that on May 17, 2024, I served the foregoing document on all parties via CM/ECF.

/s/ Michael E. Thakur
Michael E. Thakur